

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

2017 JUL 27 PM 3:25

Mary Blaney

Frances Lombardi

Write the full name of each plaintiff.

**17 CV 5841**

(Include case number if one has been assigned)

-against-

County of Nassau, Nassau County Police  
Dept, Nassau County Attorney Carrell

Forskey, Nassau County Detective John

O'Connor, Christopher Poggiali,

Denise Vedder and Lorna Mund, Beth McKenzie

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

**COMPLAINT**

Do you want a jury trial?

☒ Yes ☐ No

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

42 U.S.C. Section 1985 and 42 U.S.C. Section 1983

### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, \_\_\_\_\_, is a citizen of the State of  
(Plaintiff's name)

\_\_\_\_\_  
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

\_\_\_\_\_  
If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of \_\_\_\_\_  
(Defendant's name)

\_\_\_\_\_  
or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

<u>Mary</u>		<u>Blaney</u>
First Name	Middle Initial	Last Name
<u>1537 White Plains Road #1A</u>		
Street Address		
<u>Bronx, Bronx</u>	<u>NY</u>	<u>10462</u>
County, City	State	Zip Code
<u>929-216-5333</u>	<u>MLB196824@100.com</u>	
Telephone Number	Email Address (if available)	

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of \_\_\_\_\_  
(Defendant's name)

\_\_\_\_\_  
or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of \_\_\_\_\_  
the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Frances Lombardi  
\_\_\_\_\_  
First Name Middle Initial Last Name

1537 White Plains Road #2B  
\_\_\_\_\_  
Street Address

Bronx, Bronx NY 10462  
\_\_\_\_\_  
County, City State Zip Code

929-216-5333 MaroseBronx@protonmail.com  
\_\_\_\_\_  
Telephone Number Email Address (if available)

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	<u>County of Nassau</u> <div style="display: flex; justify-content: space-between; width: 100%;"> <span>First Name</span> <span>Last Name</span> </div>		
	<u>One West Street</u> Current Job Title (or other identifying information)		
	<u>Mineola/Nassau NY 11501</u> <div style="display: flex; justify-content: space-between; width: 100%;"> <span>County, City</span> <span>State</span> <span>Zip Code</span> </div>		
Defendant 2:	<u>Nassau County Police Dept.</u> <div style="display: flex; justify-content: space-between; width: 100%;"> <span>First Name</span> <span>Last Name</span> </div>		
	<u>1490 Franklin Ave</u> Current Job Title (or other identifying information)		
	<u>Nassau/Mineola NY 11501</u> <div style="display: flex; justify-content: space-between; width: 100%;"> <span>County, City</span> <span>State</span> <span>Zip Code</span> </div>		
Defendant 3:	<u>Carnell Foskey</u> <div style="display: flex; justify-content: space-between; width: 100%;"> <span>First Name</span> <span>Last Name</span> </div>		
	<u>Nassau County Attorney</u> Current Job Title (or other identifying information)		
	<u>One West Street</u> Current Work Address (or other address where defendant may be served)		
	<u>Nassau/Mineola, NY 11501</u> <div style="display: flex; justify-content: space-between; width: 100%;"> <span>County, City</span> <span>State</span> <span>Zip Code</span> </div>		

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant <sup>4</sup> 1	John O'Connor
	First Name Last Name
	Nassau County Detective
	Current Job Title (or other identifying information)
	Third Precinct, 214 Hillside Ave
	Current Work Address (or other address where defendant may be served)
	Nassau/Williston Park, NY 11596
	County, City State Zip Code
Defendant <sup>5</sup> 2	Christopher Poggiali
	First Name Last Name
	Laborer at Nassau County Dept. of Public Works
	Current Job Title (or other identifying information)
	171 Cortigue Rock Rd.
	Current Work Address (or other address where defendant may be served)
	Nassau/Hicksville, NY 11801
	County, City State Zip Code
Defendant <sup>6</sup> 3	Denise Vedder
	First Name Last Name
	Confidential Asst to Nassau County Attorney
	Current Job Title (or other identifying information)
	One West Street
	Current Work Address (or other address where defendant may be served)
	Nassau/Mineola, NY 11501
	County, City State Zip Code

Defendant 7 Lorna Mund  
 First Name Last Name  
Saleswoman at Shore 2 Shore Wireless  
 Current Job Title (or other identifying information)  
5550 Merrick Road, #302  
 Current Work Address (or other address where defendant may be served)  
Nassau/Massapequa NY 11758  
 County, City State Zip Code

### III. STATEMENT OF CLAIM

Place(s) of occurrence: Bronx NY; Queens NY; Nassau County NY;  
Essex, Bergen and Atlantic County, NJ; Philadelphia, PA

Date(s) of occurrence: February 2011 to the present

#### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Threats, harassment and stalking in person, through third parties and on the Internet by Christopher Poggiali, Denise Vedder and Lorna Mund. These parties were dispatched by Nassau County Attorney Cornell Foskey to terrorize me. He did this to get back at me for publicly criticizing him as incompetent and for discriminating against women, Latinos, Jews and other minorities and for abusing my daughter from the bench in his prior job as Supervising Judge of Nassau Family Court.

On going vandalism of my home and another property we own at 1625 Benson St. Bronx NY 10461. On Sept 17, 2015, Nassau County Det. Beth McKenzie was caught on security cam ringing the bell to Apt- 2F (my apt at the time) and then violently kicking in entrance door to lobby and shattering it into 1000 pieces. She did this to intimidate me because

Zip Code

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.



I had filed for an Order of Protection against a friend of hers who owned a club, Esther Kuhner. Det. Beth McKenzie came to destroy the door of my home the day after Esther was served with the summons to appear at the hearing for the Order of Protection. I made a report with the NYPD, and the case was referred to Internal Affairs and Detective Rolon. This was November 2015. In December 2015, I received a letter from the NYPD Chief of Dept. stating that an investigation had confirmed that Detective Beth McKenzie came out of Nassau County and was not NYPD and that the investigation was being referred to Nassau County. Of course, no investigation was ever done.

Deprivation of liberty and property without due process; repeated illegal detention without a warrant or charges

Nassau County permitted the other parties to continue to operate in their jobs in a way that breaks the law. The Nassau County Police engaged in a pattern of harassment and intimidation and illegally detained me without a warrant or charges on several occasions under false pretenses. Nassau County Attorney Carnell Foskey dispatched his confidential assistant Denise Vedder and her boyfriend Christopher Poggiali and another helper Lorna Mund to stalk, harass and terrorize myself, my mom and our tenement house business in the Bronx to get back at me for criticizing his performance in his prior job as supervising judge of Nassau Family Court. Nassau County Detective John O'Connor misused his official position to help his crony from the bar Christopher Poggiali violate an order of protection I have against him and also tried to use other bar cronies to help him file some nature of false criminal charges against me in an effort to give me an arrest record or a criminal conviction when I have not broken the law and have not committed any crime. On July 12, 2017, Detective O'Connor told me by phone that he was getting a warrant for my arrest. I told him to contact my lawyer, Leonard Gillespie of Brooklyn, and gave him the phone number. I told Detective O'Connor that he was not to contact me again.

Christopher Poggiali, Denise Vedder, and Lorna Mund engaged in a pattern of harassment and intimidation whose goal was to terrorize me, my 87 year old mom, and our tenement house business and to drive us out of Nassau County and cause us to lose our business and leave Nassau County and New York State.

Violation of Orders of Protection issued by Bronx Criminal Court and Bronx Family Court on July 19, 2017, by Nassau County Detective John O'Connor and Christopher Poggiali when they came to try to break down the front door to the

home of my 88 year old father at 1 o'clock in the morning at 24 Caumsett Farms Lane, Woodbury, NY 11797.

On July 6, 2017, my car was violently rear ended in a hit and run accident by Olney High School in Philadelphia, PA. The other motorist sped away from the scene of the accident. My car sustained \$1,886 worth of damage because the entire rear panel of the car had to be replaced as well as the bumper.

On June 28, 2017, Christopher, Denise, and Lorna hacked my e-mail account and my phone and sent threatening, abusive and cruel communications in my name to my 10 year old daughter. These communications were intercepted by my daughter's therapist, Dr. Regina Cofrin, who told her dad to report them to the police.

On June 22, 2017, Christopher, Denise, and Lorna hacked my e-mail account and made a false report to State Farm Insurance that my car had been stolen. The police put an alarm out on the car, and my friend's brother was nearly arrested for auto theft while driving. The police released him after reaching me by phone and confirming that my car was not in fact stolen and that the driver did, in fact, have my permission to drive the car.

On June 15, 2017, Christopher Poggiali stole my car. I have a police report from the 7<sup>th</sup> District Police (215) 686-3070 in Philadelphia, PA dated June 16, 2017. The report number is 033266, and I was told the case has now been referred to Special Victims Unit 1 of the Pennsylvania State Police.

On June 4, 2017, Christopher stalked my vehicle to Wildwood, NJ. He loosened the lug nuts of one wheel. As a result, the wheel came flying off the car on the Garden State Parkway and the car was in a serious one car accident that day around 11 a.m. The passenger broke his L3 spine and knee and had eye injuries. He was removed to a trauma center at Cooper University Hospital in Camden, NJ, where he had to have neurosurgery on his back. He spent 10 days in the hospital and the doctor has said he will not be able to work for the next 4 to 6 months and will likely not be able to work in construction again. I have a police report Case No. 17-35708 from the Wildwood Police Dept. at 4400 New Jersey Avenue, Wildwood, NJ 08260 (609) 522-0222 dated July 2, 2017, for this incident.

In early June 2017, the entrance door to my property at 1625 Benson Street,

Bronx, was once again completely destroyed. I had to replace it once again.

On May 21, 2017, I was falsely arrested at the NYPD Precinct 43 and illegally detained and thrown into the psych ER at Lincoln Hospital in the Bronx. This occurred when I visited to the precinct to make another police report about the latest stalking incident the prior week. I have no criminal convictions, no arrest record, and have never collected government benefits, etc. I do have a 30 year work record of legitimate on the books jobs, etc. I have no indicators of violent behavior or mental illness. Nassau County has a mole in the NYPD Precinct 43.

On the evening of March 17, 2017, Christopher Poggiali came to my home at 1537 White Plains Road in the Bronx with Denise Vedder and Lorna Mund. The girls were seen breaking into my mailbox and stealing my mail and Christopher was seen urinating all over the public hallway. I went to the NYPD Precinct 43 and they told me to file a case with the U.S. Postal Inspector. I did this. I also opened up a Post Office Box in order to receive my mail in a more secure location.

In February, 2017, Lorna Mund followed me home from work on a NJ Transit bus out of the Port Authority Bus Terminal in Manhattan. She followed me to my confidential address where I was hiding out in Belleville, NJ. Lorna then went on the Internet and hacked into my Chase checking account. She changed the address to my confidential address. As a result, I had to abandon that address. This cost me \$3,500.

On January 24, 2017, at 5 a.m. Nassau County employees conspired with NYPD friends in the 45<sup>th</sup> Precinct in Throgs Neck, Bronx, NY, to conduct a drug and narcotics raid against my tenant, Anthony Pascale, of 1625 Benson Street, Apt. 2C, Bronx, NY 10461. They misled the judge into signing a search warrant on a false basis as there have been no complaints with the NYPD or the landlord or anyplace regarding Mr. Pascale who is 60 years old and in poor health. The object of this raid was to disrupt my business and intimidate me and my tenants.

On December 31, 2016, the NYPD were called to my property at 1625 Benson Street, Bronx, NY 10461 because of gun shots and a disturbance emanating from Apt. 3E occupied by Tyari McGregor. Instead of going to the correct apartment (3E), the NYPD from the 45<sup>th</sup> Precinct instead went to Apt. 2E occupied by Anita

Villanueva and began harassing and intimidating Ms. Villanueva. This is outrageous because Ms. Villanueva is the victim, and Ms. McGregor is the aggressor who is disturbing the entire building and is currently under eviction. Nassau County has a mole in the NYPD Precinct 45.

On December 18, 2016, at 1 a.m. Nassau County employees/officials sent an assailant to stalk my super and his wife, Santos and Amanda Plaza, at 1537 White Plains Road, Bronx, NY 10462. The assailant who was later traced to New Cassel in Westbury, Nassau County, NY threw Santos and Amanda down a flight of stairs and then ran out of the building without even trying to rob them. They were taken to Jacobi Hospital by ambulance and lost time from work. Their Christmas and New Year holidays were ruined. The object was to terrorize my super in order to get him to quit so that I would have to find a new super.

On December 3, 2016, Nassau County employees sent vandals to break the entrance door of my property at 1625 Benson Street, Bronx, NY 10461. They were caught on security camera. We filed a police report and gave the video clip to the NYPD at the 45<sup>th</sup> Precinct and made follow up phone calls to the detectives, but no investigation was ever done by the NYPD.

On May 17, 2016, Christopher Poggiali stalked and carjacked me in Levittown, NY. He physically assaulted me and attempted to sexually assault me but I fought him off and he eventually left.

Between August, 2015, and March, 2017, Christopher Poggiali and unknown third parties repeatedly vandalized the entrance door to my property at 1537 White Plains Road, Bronx, NY 10462. They did such serious vandalism that the entire door and frame had to be removed and replaced. We replaced the entrance door to the lobby in March, 2017, at a cost of \$3,500. On June 25, 2017, at 10 p.m. Christopher Poggiali destroyed the new entrance door to the building once again.

Detective Beth McKenzie aided and abetted a stalker who was committing domestic violence against me. She permitted this abuser and stalker who I was fleeing from and his mother to file a missing persons report relating to me. This party was Esther Kuhner and her son Fred Kuhner, the owners of a social club that has since been closed down after over a decade of disrupting the community with violence, drugs and criminality. Det. McKenzie stalked me to Bayside,

Queens and illegally detained me without a warrant or charges and also kidnapped my 8 year old daughter Rosemarie Blaney and returned her to an abusive home/domestic violence situation over my strenuous objections. She unsuccessfully tried to have me committed to a mental hospital but the hospital declined to admit me and referred me to Safe Horizons domestic violence program. This occurred on June 25, 2015, at 4 a.m.

Illegal police raid and illegal detention with a warrant or charges on my home at 378 Avalon Place, East Meadow, NY 11554 on July 1, 2015, at 8 p.m. by Nassau County Police. The police barged into my home and accused me to harboring MS-13 gang members. They search my home without a search warrant. When they found nobody except my addict husband and my then 8-year-old daughter, they changed their story and falsely accused me to being bipolar. They said they had gotten their info from Fred Kuhner. Fred Kuhner is a guy with a long rap sheet and a history of mental illness and drug and alcohol addiction. He had sexually harassed me in May 2015 by sticking a phone down the front of my blouse and taking a picture of my breasts at his grandmother's house. In a separate subsequent incident, Fred was the perpetrator in a robbery and hostage situation at a relative's home in Hicksville on June 23, 2015, that resulted in the Nassau County Police being called by my cousin. The police directed Fred to return my cell phone and purse to me and to permit me to leave the premises with my 8 year old daughter. The police then held Fred back for 30 minutes to permit us to get to a place of safety. But on the word of this Fred Kuhner who actually had open charges against him in Nassau County at the time, the Nassau County Police forcibly brought me in handcuffs to the psych ER of Nassau University Medical Center.

In February, 2015, Christopher Poggiali stalked me to my job on Irving Avenue in Bushwick, Brooklyn. He was caught vandalizing my car by the custodian's helper at Bushwick HS. I had to have my car towed to where I was then living in East Meadow, NY. I sold the car to the tow truck operator. The next week the operator called to tell me that I had sold him a good car—the only problem he found was the starter had a missing piece.

In October 2014 my estranged husband Frank Blaney was run off the westbound lanes of the Southern State Parkway while on his way home from work at 4 a.m. The guy who ran him off the road was Christopher Poggiali. After he pushed my car (driven by my estranged husband) off onto the grass, Mr. Poggiali threw his car into reverse and then forward and hit my car with such force that he caused

the bumper to fall off my car! My estranged husband and I returned to the scene several hours later in day light and retrieved the bumper and wired it back onto my car.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

They wore down my physical health and caused me to need medical treatment in the ER generally once a month. They caused me emotional and psychological pain and anxiety. I had to seek treatment from a therapist and a psychiatrist for this reason and incurred substantial medical bills for the above.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

I am asking for \$5 million from Nassau County, \$5 million from the Nassau County Police, \$5 million from Carrell Foskey, \$1 million from John O'Connor, \$1 million from Christopher Poggiali, \$1 million from Denise Vedder, \$500,000 from Lorna Mund and \$5 million from Beth McKenzie. I am asking the court to issue an order permanently forbidding all parties to try to contact myself, my children, my parents, sister, employees, coworkers, supervisors, neighbors and tenants and forbidding them to speak my name or write about me, my mom, or our business.

**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

<u>July 25, 2017</u>		<u>Mary Blaney</u>	
Dated		Plaintiff's Signature	
<u>Mary</u>		<u>Blaney</u>	
First Name	Middle Initial	Last Name	
<u>1537 White Plains Rd. #1A</u>			
Street Address			
<u>Bronx, Bronx</u>	<u>NY</u>	<u>10462</u>	
County, City	State	Zip Code	
<u>929-216-5333</u>	<u>MLB1968@yahoo.com</u>		
Telephone Number	Email Address (if available)		

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☒ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

<u>July 25, 2017</u>		<u>Frances M. Lombardi</u>	
Dated		Plaintiff's Signature	
<u>Frances</u>		<u>Lombardi</u>	
First Name	Middle Initial	Last Name	
<u>1537 White Plains Rd. # 2B</u>			
Street Address			
<u>Bronx, Bronx</u>		<u>NY</u>	<u>10462</u>
County, City		State	Zip Code
<u>929-216-5333</u>		<u>MaroseBronx@protonmail.com</u>	
Telephone Number		Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☒ No

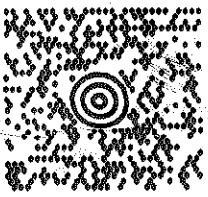
If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

MARY BLANEY AND FRANCES LOMBARDI  
(929) 216-5333  
APT 2B  
1537 WHITE PLAINS ROAD  
BRONX NY 10462

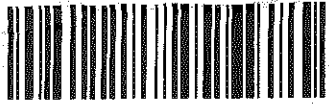
1 LBS 1 OF 1  
SHP WT: 1 LBS  
DATE: 26 JUL 2017

SHIP PRO SE INTAKE UNIT  
TO: (212) 805-0175  
CLERK OF THE COURT USDC SDNY  
500 PEARL ST

NEW YORK NY 10007-1316

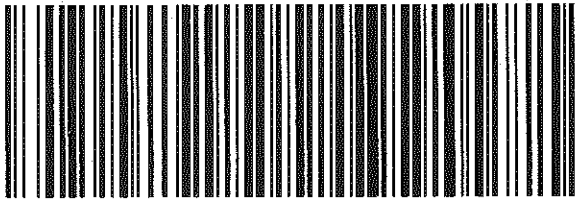


NY 102 9-10



UPS GROUND

TRACKING #: 1Z 4AR 649 03 2024 8754

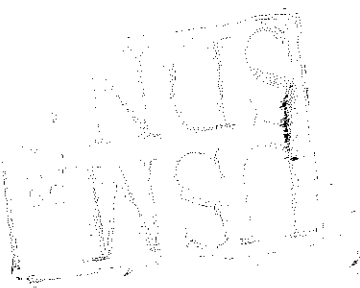


BILLING: P/P

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SHIP PRO SE INTAKE UNIT  
SONY DOCKET UNIT  
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